

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

OLLIE GREENE, Individually as the
surviving parent of WYNDELL GREENE,
SR., WILLIAM GREENE, as the
Administrator of the Estate of WYNDELL
GREENE, SR., and MARILYN BURDETTE
HARDEMAN, Individually and as the
surviving parent of LAKEYSHA GREENE,

Plaintiffs,

v.

TOYOTA MOTOR CORPORATION,
TOYOTA MOTOR ENGINEERING &
MANUFACTURING NORTH AMERICA,
INC., TOYOTA MOTOR SALES USA, INC.
VOLVO GROUP NORTH AMERICA, INC.
VOLVO TRUCKS NORTH AMERICA, a
DIVISION OF VOLVO GROUP NORTH
AMERICAN, LLC., STRICK
CORPORATION, INC., JOHN FAYARD
MOVING & WAREHOUSE, LLC and
DOLPHIN LINE, INC.

Defendants.

CAUSE NUMBER 3:11-cv-0207-N

JURY TRIAL DEMANDED

**APPENDIX IN SUPPORT OF DEFENDANT STRICK TRAILER, LLC'S
MOTION TO CROSS-DESIGNATE TOYOTA EXPERT ROBERT LANGE**

Defendant STRICK TRAILERS, LLC ("Strick") files this Appendix to its Motion to

Cross-Designate Toyota Expert Robert Lange, respectfully showing:

EXHIBIT	DESCRIPTION	PAGE NUMBERS
Exhibit 1	Cross-Designation of Robert Lange	App 1-3
Exhibit 2	Proposed Order	App 4-5

Respectfully submitted,
DAWSON & CLARK, P.C.

/s/ Donald H. Dawson, Jr.
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**ATTORNEYS FOR DEFENDANT
STRICK**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on Monday, January 20, 2014, a true and correct copy of the above and foregoing was forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Donald H. Dawson, Jr.
DONALD H. DAWSON, JR.

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DEFENDANT STRICK TRAILERS, LLC'S CROSS-DESIGNATION
OF TOYOTA EXPERT ROBERT LANGE

COMES NOW, Defendant Strick Trailers, LLC ("Strick"), by counsel, and serves the following cross-designation of Toyota expert Robert Lange for the purposes of providing expert testimony, pursuant to Federal Rule of Civil Procedure 26(a)(2)(A):

Non-Retained Expert Witnesses

1. Robert Lange
Exponent
39100 County Club Drive
Farmington Hills, MI 48331

Mr. Lange is an engineer who will offer opinions and testimony regarding the design, testing and performance of the subject vehicle's structure, occupant protections systems, and fuel system, and the design characteristics criticized by Plaintiffs. Lange's testimony also addresses a number of subjects which are relevant to the Plaintiffs' claims against Strick including, but not limited to the severity of the accident sequence, the damage sustained by the subject vehicle, and the cause of the resulting fire. Mr. Lange's opinions, and the basis for same, are more fully expressed in his report which was filed by Toyota on December 20, 2013. A copy of Mr. Lange's report, curriculum vitae (including a list of publications), testimony list, and exhibit list are attached.

Reservation of Rights to Supplement and Designate Additional Experts

In addition to the foregoing designation(s), Strick reserves the right to supplement this designation and make additional designations of experts as contemplated by Federal Rule of Civil Procedure 26(a)(2) as needed.

Respectfully submitted,

DAWSON & CLARK, P.C.

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/s/ S. Todd Parks

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ATTORNEYS FOR DEFENDANT STRICK

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2014, a copy of the foregoing, together with all exhibits, if any, was served on all counsel of record to this case.

/s/ Donald H. Dawson, Jr.

DONALD H. DAWSON, JR.

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ORDER

Before the Court is Defendant Strick Trailer, LLC's ("Strick") Motion for Leave to Cross-Designate Toyota Expert Robert Lange filed on January 20, 2014. After consideration of the relevant filings, evidence, and applicable law, the Court finds good cause for granting the Motion for Leave to Cross-Designate Toyota Expert Robert Lange.

The Motion for Leave to Cross-Designate Toyota Expert Robert Lange is therefore **GRANTED** as follows:

1. Strick's cross-designation of Robert Lange is hereby granted and deemed filed as of January 20, 2014.

SO ORDERED on this __ day of January, 2014.

United States District Court Judge